

## ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

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**Date/Time:** March 28, 2002/ 3 00 pm

**Site Contact(s):** Alec Cameron  
**Phone:** (303) 966-4787

**Regulatory Contact:** James Hindman and Denise Onyskiw  
**Phone:** (303) 966-4482 / (303) 966-6687

**Agency:** Colorado Department of Public Health and Environment

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**Purpose of Contact:** Alarm and Inspection Requirements for Valve Vaults

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### **Discussion**

The purpose of the meeting was to review the overall plan for closure of the valve vault system and come to agreement on alarm and inspection requirements. The valve vault system discussions and decisions are organized into three areas.

#### 400 Area Valve Vaults (VV14-20 and B428)

##### ***Plan***

The 400 Area process lines associated with valve vaults 14-20 will be blown down from Building 460, Building 444, and Building 443 to Building 374. Following the blowdown, the process lines in each valve vault will be tapped and drained to remove the liquid from the system and the system will be locked out at Building 460, Building 444, Building 428, and Building 443 to prevent additional water from being added to the system. After the tap and drain is completed, a spool piece will be removed from Valve Vault 16 for examination to determine the amount of sludge holdup in the system.

##### ***Agreement***

CDPHE will examine the spool piece and verify the lockouts in Building 460, 444, 428, 122 and 443. Based on a satisfactory verification of the lockouts and spool piece, Mr. Hindman agreed with the following changes to the 400 area valve vault system:

- The Valve Vault alarm system may be disabled.
- Kaiser Hill will verify that there is no free standing water in the valve vaults on a weekly basis by looking down from above the valve vault. Any free standing water will be pumped out within 24 hours of the weekly inspection and managed as incidental water.

- KH will complete quarterly RCRA inspections on the 400 area valve vault system using the same criteria and inspection form as the current monthly valve vault inspections

#### 800 Area Valve Vaults (VV1-7)

##### ***Plan***

The 800 Area valve vaults and associated process lines, (VV1-7) will be blown down to Building 374. Following the blowdown, the process lines in each valve vault will be tapped and drained to remove the liquid from the system and the system will be locked out to prevent additional water from being added to the system. After the tap and drain is completed, a spool piece will be removed from Valve Vault 7 for examination to determine the amount of sludge holdup in the system.

##### ***Agreement***

CDPHE will examine the spool piece and verify the lockouts. Based on a satisfactory verification of the lockouts and spool piece, Mr. Hindman agreed with the following changes to the 800 area valve vault system:

- The Valve Vault alarm system may be disabled
- Kaiser Hill will verify that there is no free standing water in the valve vaults on a weekly basis by looking down from above the valve vault. Any free standing water will be pumped out within 24 hours of the weekly inspection and managed as incidental water.
- KH will complete quarterly RCRA inspections on the 800 area valve vault system using the same criteria and inspection form as the current monthly valve vault inspections.

#### 700 Area Valve Vaults (VV8-13)

##### ***Plan***

The 700 Area valve vaults and associated process lines will be used as part of the AWTs project. The alarm functions will be maintained for the 700 area valve vaults and responses to the alarms during operations will include:

- Shutting down transfer operations
- Determining the cause of the alarm and clearing the alarm prior to transfers

##### ***Agreement***

Mr. Hindman agreed with the following changes to the 700 area valve vault system effective immediately:

- Kaiser Hill will respond to alarms during off-shifts and weekends (during times of non-transfer) by a visual inspection of the valve vault in alarm.
- If the person inspecting the valve vault determines that the cause of the alarm is groundwater entering the valve vault and not process water, daily inspections will continue until the next working day when the water will be pumped out and managed through the AWTs system. These off-shift and weekend inspections may be performed by non-RCRA trained

personnel based on the low risk of process water leaking during non-transfer situations

- If the person inspecting the valve vault determines that the cause of the alarm is a failure in the process piping or other source of process water, the valve vault will be pumped out and the alarm will be cleared within 24 hours

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**Contact Record Prepared By:** Alec Cameron

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